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12 Google Inc.

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN JOSE DIVISION
16

17 KINDERSTART.COM, LLC, a California)
18 limited liability company, on behalf of itself)
and all others similarly situated,)

19 Plaintiffs,)

20 v.)

21 GOOGLE INC., a Delaware corporation,)

22 Defendant.)

CASE NO.: C 06-2057 JF (RS)

**[PROPOSED] ORDER GRANTING
DEFENDANT GOOGLE INC.'S
MOTION FOR SANCTIONS AGAINST
KINDERSTART.COM AND GREGORY
J. YU PURSUANT TO FED. R. CIV. P.
RULE 11**

Before: Hon. Jeremy Fogel

Date: December 8, 2006

Time: 9:00am

Courtroom: 3, 5th Floor

1 Defendant Google Inc.'s ("Google") Motion for Sanctions against KinderStart.com, LLC
2 ("KinderStart") and Gregory J. Yu ("Mr. Yu") Pursuant to Fed. R. Civ. P. Rule 11 came on for
3 hearing before this Court on December 8, 2006 in Department 3, the Honorable Jeremy Fogel
4 presiding. The Court has reviewed the parties' submissions and heard oral argument and good
5 cause appearing IT IS HEREBY ORDERED THAT Google's Motion for Sanctions is
6 GRANTED.

7 The following paragraphs from the Second Amended Complaint shall be stricken:
8 ¶¶ 60(c), 89, 99, 130, 131, 135, 136, 147, 166, 167, 238, 243, 257 and 266(f), and KinderStart
9 shall not include these allegations in any future pleadings.

10 KinderStart and Mr. Yu shall reimburse Google for reasonable attorneys' fees attributable
11 to the motion for sanctions, and a portion of the fees attributable to Google's motions to dismiss
12 and strike the SAC. Google shall file a motion for attorney's fees under Civil L.R. 54-6 within
13 14 days of entry of this order.

14
15 Dated: _____, 2006

The Honorable Jeremy Fogel